

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

TWELVE THOUSAND SIX HUNDRED  
SIXTY-SEVEN AND 00/100 DOLLARS  
(\$12,667.00) IN UNITED STATES  
CURRENCY,

Defendant.

C-2-13-1133  
JUDGE SARGUS  
Magistrate Judge Abel

PLAINTIFF'S FIRST SET OF SPECIAL INTERROGATORIES

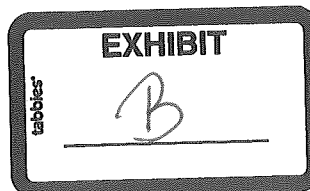
Please take notice that pursuant to Rule G(6)(a) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, Plaintiff, United States of America, requests that you answer the following interrogatories within twenty-one (21) days after the interrogatories have been served.

RESPONSES

A. These discovery requests are directed to Claimant Enrique Alejandro Davidovich. Responses are to be completed to the best of Claimant's knowledge and/or the knowledge of Claimant's investigators, agents, employees, or other representatives.

B. "Defendant Currency" is defined as the \$12,667.00 in United States Currency seized on July 2, 2013 from Claimant Enrique Alejandro Davidovich at the Columbus International Airport.

C. Responses to these special interrogatories are subject to Rule 26(e) of the Federal Rules of Civil Procedure and you are under duty to reasonably amend and/or supplement responses.



D. S.D. Ohio Civ. R. 26.1(b) requires that your responses repeat the discovery request immediately prior to each answer, objection or other response if you do not respond to this document.

E. Responses should be delivered to the United States Attorney's Office, Attn: Assistant United States Attorney Deborah F. Sanders, 303 Marconi Boulevard, Suite 200, Columbus, Ohio 43215.

SPEICAL INTERROGATORIES

INTERROGATORY NO. 1:

Please state in detail the nature of your interest in the Defendant Currency, including but not limited to the following information:

a) The date(s) which you obtained any portion of the Defendant Currency;

b) The name, address, and telephone number(s) for any person(s) from whom any portion of the Defendant Currency was received.

c) The reason why the currency was given to you;

d) Identify any documentation supporting how and why you obtained the Defendant Currency;

e) Describe what you intended to do with the Defendant Currency; and,

f) Identify any person, with their full name, address, and telephone number(s), present when you acquired any portion of the Defendant Currency.

INTERROGATORY NO. 2:

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Please explain in detail how you accumulated the Defendant Currency, including but not limited to:

a) The source(s) of the currency;

- b) The date(s) over which you accumulated the currency;
- c) The place(s) which you stored the currency;
- d) The name, address, and telephone number(s) for any person with knowledge of this accumulation.

INTERROGATORY NO. 3:

If you have explained your accumulation of any portion of the Defendant Currency in response to Interrogatory No. 3, please state whether any portion of such Defendant Currency was deposited, stored, and/or withdrawn from an account held at any financial institution by you and/or on your behalf.

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INTERROGATORY NO. 4:

If any portion of the Defendant Currency was deposited, stored, and/or withdrawn from any account held at any financial institution by you and/or on your behalf, please state:

a) The name of the financial institution;

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c) The name(s) on the account(s);

d) The account number(s);

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e) The date(s) of withdrawal that put the currency in your possession; and,

- f) The amount(s) of these withdrawal.

INTERROGATORY NO. 5:

Please states in detail, your employment history from July 2, 2008 through July 2, 2013,  
including:

- a) The employer(s) and/or business' full name, address, and telephone number;
- b) The work location address if different that the employer's address;
- c) The name(s) and title(s) of direct supervisors, including their contact information;

- d) Your hourly wage and/or salary;
- e) The dates of employment; and,
- f) The reason(s) for termination of employment.

INTERROGATORY NO. 6:

Please list any work performed by you as a “camera man” during the period from July 2, 2008, through July 2, 2013, including:

- a) The name of the person(s), company(s), and/or organization(s) for whom the work was performed and the contact address and telephone number for the person, company, and/or organization;

- b) A description of the type of work performed;
- c) The date(s) of the work performed;
- d) The location(s) where the work was performed;
- e) The amount of total compensation earned by you for the work performed, and if different than earned, the amount of compensation received by you; and,
- f) The form of compensation received by you for the work performed (i.e. check, cash, money order, trade of goods, etc.).



g) The address and telephone number(s) for Jamal Edwards and/or Painted Black Visuals/Films;

h) The date(s) you performed any type of work for and/or with Jamal Edwards and/or his company(s);

i) Any compensation received by you for said work for and/or with Jamal Edwards and/or his company(s), including cash, check, money order, trade of goods, etc.; and,

j) A description of the work performed for and/or with Jamal Edwards and/or his company(s).

INTERROGATORY NO. 7:

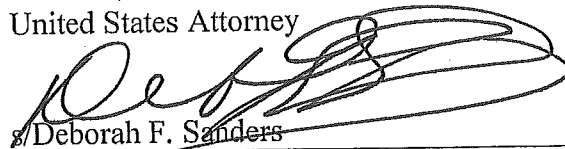
If you have any records, documents or tangible items that document or relate in any way to your response to these interrogatories or are otherwise relevant to your interest in the Defendant Currency or your claim to the Defendant Currency, please identify each piece of evidence with specificity, including the name, address, and telephone number(s) of its custodian. In lieu thereof, you may produce copies of the records, documents or tangible items.

INTERROGATORY NO. 8:

Please state the name, address, and telephone number(s) of all persons known or believed by you to have knowledge or information pertaining to your claim of ownership of the Defendant Currency so that person may be deposed.

Respectfully submitted,

CARTER M. STEWART  
United States Attorney



s/Deborah F. Sanders

DEBORAH F. SANDERS (0043575)

Assistant United States Attorney

Attorney for Plaintiff

303 Marconi Boulevard

Suite 200

Columbus, Ohio 43215

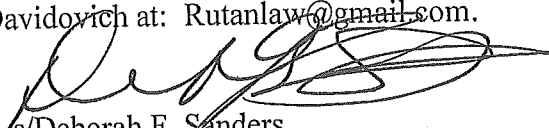
(614)469-5715

Fax: (614)469-5240

Deborah.Sanders@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on the 13<sup>th</sup> day of February, 2014, the foregoing Interrogatories were served via Federal Express delivery service, Tracking No. 7979 0880 4380, on: John P.M. Rutan, Esquire, 336 South High Street, Columbus, Ohio 43215; and Word version of the foregoing Interrogatories was also served via electronic mail (e-mail) upon John P.M. Rutan, Esquire, attorney for Claimant Enrique Alejandro Davidovich at: [Rutanlaw@gmail.com](mailto:Rutanlaw@gmail.com).

  
s/Deborah F. Sanders

DEBORAH F. SANDERS (0043575)  
Assistant United States Attorney